

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:19-cv-00394-BO

STEWART ABRAMSON, PAUL JONES)
AND MARK FITZHENRY,)
ON BEHALF OF THEMSELVES AND)
ALL OTHERS SIMILARLY SITUATED,)
)
 PLAINTIFFS,)
)
 v.)
)
SAFE STREETS USA LLC, and TEKTIKS)
INNOVATIVE NETWORK USA INC,)
)
)
)
 DEFENDANTS.)

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, SERVICE AWARD, AND CLASS COUNSEL FEES AND COSTS**

Plaintiffs Paul Jones, Mark Fitzhenry, and Stewart Abramson, individually and on behalf of a proposed class of similarly situated persons, with the consent of Defendant Safe Streets USA LLC, hereby move the Court for entry of an order granting final approval of the Settlement Agreement, finding that the class notice program satisfies due process and Rule 23, finding the Settlement Agreement to be fair, reasonable, and adequate to the Class, dismissing the claims against Defendants with prejudice, retaining jurisdiction of matters only relating to enforcement of the Settlement Agreement, and granting a service award to Plaintiffs and Class Counsel's attorneys' fees and costs. The grounds for this Motion are set forth with particularity and in more detail in the accompanying Memorandum in Support, which is incorporated herein by reference.

Dated: December 29, 2021

Respectfully submitted,

/s/ Avi R. Kaufman

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Local Civil Rule 83.1(d) Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 29, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which is being served this day on all counsel of record via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ Avi R. Kaufman